

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

John Doe, Jack Doe, Jason Doe, Joseph Doe,  
James Doe, Jeffrey Doe individually, and on  
behalf of all others similarly situated; the  
Episcopal Diocese of Olympia, and the Council  
on American Islamic Relations-Washington,

Plaintiffs,

v.

Donald Trump, President of The United States;  
U.S. Department of State; Rex Tillerson,  
Secretary of State; U.S. Department of  
Homeland Security; Elaine Duke, Acting  
Secretary of Homeland Security; U.S. Customs  
and Border Protection; Kevin McAleenan,  
Acting Commissioner of U.S. Customs and  
Border Protection; and Michele James, Field  
Director of the Seattle Field Office of U.S.  
Customs and Border Protection; Office of the  
Director of National Intelligence; and Daniel  
Coats, Director of the Office of the Director of  
National Intelligence,

Defendants.

No. 2:17-cv-00178-JLR

DECLARATION OF  
JOSEPH DOE IN SUPPORT OF  
MOTION FOR PRELIMINARY  
INJUNCTION

I, "Joseph Doe," do hereby declare and state:

DECLARATION OF JOSEPH  
DOE  
(2:17-cv-00178-JLR) - 1

AMERICAN CIVIL LIBERTIES UNION  
OF WASHINGTON FOUNDATION  
901 Fifth Avenue, Suite 630  
Seattle, Washington 98164  
TELEPHONE: (206) 624-2184

KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101-3052  
TELEPHONE: (206) 623-1900  
FACSIMILE: (206) 623-3384

1           1.     I have personal knowledge of the matters contained herein and, where I do not  
2 have direct knowledge, I believe them to be true and correct based upon the information  
3 available to me.

4           2.     I am originally from Somalia. I currently live in Des Moines, Washington.

5           3.     When I was a child, my family and I fled Somalia because of the violent civil war  
6 in our country, to escape persecution and the risk of being killed because of our clan  
7 membership.

8           4.     While we were trying to reach safety, we spent weeks trying to stay hidden in the  
9 forest while trying to get to Kenya on foot and without food. Fighters from one of the warring  
10 factions found us in the forest and raped my older sister in front of me and my family. My  
11 mother tried to stop the rape, but the men clubbed her in the head with the butt of their guns. My  
12 sister was pregnant at that time, and she had so much bleeding after the assault that she died.  
13

14           5.     We eventually got to Kenya and began living in a refugee camp. I lived in  
15 refugee camps in Kenya starting in 1992 when I was approximately 10 years old. I was in  
16 refugee camps for nearly 22 years.

17           6.     I first initially interviewed with the United Nations High Commissioner for  
18 Refugees in 2000 with my mother, two brothers, and three surviving sisters.

19           7.     One day in 2004 when I returned to the refugee camp after going out to try and  
20 earn some money for my family, I learned that the local Turkana people had raided the camp  
21 while I was gone, and my family had disappeared. I have not seen them since although I recently  
22 learned after all these years that some of my family are still alive.

23           8.     By the time I finally interviewed with USCIS/DHS in 2011, I had met my wife  
24 and gotten married. We have three children.

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26  
DECLARATION OF JOSEPH  
DOE  
(2:17-cv-00178-JLR) - 2

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1           9.       I finally completed the extensive DSH/USCIS screening process in December  
2 2013 and arrived in the United States on January 28, 2014, as a refugee. But my refugee status  
3 only applied to myself, not my wife and children, as the refugee process was started when I first  
4 arrived at a refugee camp as a child. I had to leave my wife and three children behind in Kenya.  
5 My youngest child was only six months old at the time I left.

6  
7           10.       In June 2015, I filed a Refugee/Asylee Relative Petition, Form I-730, for my wife  
8 and for my children, who are now 4, 5, and 9 years old. I would have filed the petitions right  
9 away but I didn't know I could petition for my family. When I first arrived in the U.S.,  
10 everything was new and I didn't understand the process. Eventually, after asking people who  
11 had been here longer than I had, I found out that I had the right to ask for my family to be  
12 admitted, and my caseworker at the International Rescue Committee helped me file the petitions.  
13

14           11.       I became a lawful permanent resident in 2016.

15           12.       My wife and children had their final interviews in November 2016, which they  
16 successfully passed; they have completed the security clearance; they completed their medical  
17 clearance on January 31, 2017; and they received their final required immunizations on March 1,  
18 2017. My family was assured by a refugee resettlement agency on June 5, 2017, and we were  
19 then only waiting for them to be scheduled for travel to the United States.  
20

21           13.       With the suspension of the refugee admissions program, the medical clearances  
22 for my wife and children had expired, and they had to go through that part of the process all over  
23 again. My wife and one of my children have received their new medical clearances. My two  
24 other children have been re-examined but we are still waiting for their results.

25           14.       I work a full-time job to support my family.  
26

1           15.     I regularly talk to my wife and children on the phone. My youngest son, now four  
2 years old, often cries for me and constantly asks me, "Where are you? Why can't you come for  
3 us?"

4           16.     With the continued suspension of admissions for I-730 follow-to-join family like  
5 mine, my family's travel to the United States will be further delayed—and possibly indefinitely  
6 if the refugee cap is met before they are admitted, and I will be prevented from being reunited  
7 with my wife and children.

8           17.     With every delay, I worry that my family will be stuck in a cycle of receiving  
9 their medical clearances but then having them expire, which would require them to repeat that  
10 part of the process, as has already happened once.

11           18.     There isn't a day that I do not think of my wife and children, wish that I could just  
12 hold and hug them, and dream of being able to be a family again, all together in one place. Often  
13 at night I can't fall asleep because I am thinking about my family and wondering if tomorrow  
14 will be the day that I get the news that my family's travel has been scheduled and I will be  
15 reunited with them.

16  
17  
18  
19           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
20 knowledge.

21           EXECUTED this 4<sup>th</sup> day of November, 2017, at Seattle, Washington.

22  
23 

24           Joseph Doe